

MAUNE RAICHLE HARTLEY FRENCH & MUDD, LLC  
Clayton L. Thompson, Esq.  
cthompson@mrhfmllaw.com  
Suzanne M. Ratcliffe, Esq.  
sratcliffe@mrhfmllaw.com  
150 West 30<sup>th</sup> Street, Suite 201  
New York, NY 10001  
Tel: (800) 358-5922

*Counsel for Mesothelioma Plaintiff Katherine Tollefson  
and Certain Mesothelioma Plaintiffs*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

In re:	)	
	)	Chapter 11
LTL MANAGEMENT LLC,	)	
	)	Case No: 23-12825-MBK
Debtor.	)	

**MRHFM'S RESPONSE TO THE DEBTOR'S OBJECTIONS TO  
FEE APPLICATIONS OF MASSEY & GAIL LLP AND HOULIHAN LOKEY**

Nearly everything in both of Johnson & Johnson's bad faith bankruptcies was hotly contested. This Court consistently and patiently heard arguments from all sides, and diligently and timely ruled on contested matters throughout both proceedings. Regrettably, over three months after issuing its detailed dismissal opinion (*In re LTL Mgmt., LLC* ("LTL2"), 652 B.R. 433 (Bankr. D.N.J. 2023)), J&J continues to demand this Court's time and attention as the half-trillionaire quibbles over the minutiae of the TCC's fee applications. *See* Dkts. 1566 & 1567 (Debtor Objs.) and 1568 & 1569 (TCC Resps.).

As MRHFM noted previously (*see* Dkts. 711 & 1501), J&J selectively chooses who is worthy of compensation. The Company happily bankrolled the professional fees of the Ad Hoc of Supporting Counsel and the Legal Representative for Future Talc Claimants. That's because the AHC and FCR supported eliminating talc cancer victims' state law remedies, barring their jury access, and helping J&J cap its asbestos liability.

The TCC, on the other hand, sought to protect the victims' rights, which is how to draw the ire of the \$500 billion puppet master. At the hearing on October 18th, TCC counsel aptly stated: "I'd like to apologize to the court, which I know is especially busy these days, for having to be here at all today." Tr. 10/18/23, 5:14-19. But it's not the TCC that should be sorry.

Johnson & Johnson continues to seek retribution against professionals that opposed its most recent—for now<sup>1</sup>—bankruptcy fraud, taking issue with Massey & Gail "timekeepers incur[ing] fees totaling \$35,920.00 related to drafting outlines and legal research related to the appeals" (Dkt. 1566, pg. 5) and claiming that "Houlihan [Lokey] is looking for a windfall, not a bonus." Dkt. 1567, pg. 3.

J&J filed in bad faith. *Twice*. J&J was wrong on the law. *Twice*. True talc cancer victims, with the TCC's help, won. *Twice*. And J&J throws away \$1.4 million to its

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<sup>1</sup> *Johnson & Johnson Looks to Texas for Unit's Third Bankruptcy Bid*, Alex Wolf, BLOOMBERG LAW, 10/18/2023, available at: <https://news.bloomberglaw.com/bankruptcy-law/johnson-johnson-looks-to-texas-for-units-third-bankruptcy-bid>

shareholders every hour, 24 hours a day, 365 days a year. There's no legal or equitable reason for the Company to hold back the relative pittance it owes the TCC's professionals under these circumstances.<sup>2</sup>

All of this is especially true when, apparently, LTL Management's professionals (not counting J&J's) charged \$5 million *more* than the TCC's. *See* Tr. 10/18/23, 7:14-20. Billionaire bankruptcy scams like the Two Step have epically failed.<sup>3</sup> Johnson & Johnson made this mess; it can't complain about the clean-up cost.

Respectfully submitted:

**MAUNE RAICHLE HARTLEY**  
**FRENCH & MUDD, LLC**



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Clayton L. Thompson, Esq.  
**MAUNE RAICHLE HARTLEY**  
**FRENCH & MUDD, LLC**  
150 W. 30<sup>th</sup> Street, Suite 201  
New York, NY 10001  
(800) 358-5922  
cthompson@mrhfmllaw.com

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<sup>2</sup> MRHFM, Ruckdeschel Law Firm, Levy Konigsberg, Kazan McClain Satterley & Greenwood, Arnold & Itkin, several States, and others, were heavily involved in *LTL2* and are not seeking reimbursement or professional fees.

<sup>3</sup> *See In re LTL Mgmt., LLC*, 64 F.4th 84 (3d Cir. 2023); *In re Aeero Techs. LLC*, 2023 WL 3938436 (Bankr. S.D. Ind. June 9, 2023); *In re LTL Mgmt., LLC* ("*LTL 2.0*"), 652 B.R. 433 (Bankr. D.N.J. 2023). James Conlan, *Time to Ditch the Texas Two-Step for a New Mass Tort Strategy*, BLOOMBERG LAW, 11/2/2023 ("The so-called Texas Two-Step bankruptcy cases ... have failed. ... The failure has been spectacular..."), available at: <https://news.bloomberglaw.com/us-law-week/time-to-ditch-the-texas-two-step-for-a-new-mass-tort-strategy-1#>